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*Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING THE PLAN ADMINISTRATOR'S FIVE HUNDRED EIGHTEENTH
OMNIBUS OBJECTION TO CLAIMS (SATISFIED GUARANTY CLAIMS)**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On June 6, 2016, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors*, filed the Plan Administrator's Five Hundred Eighteenth Omnibus Objection to Claims (Satisfied Guaranty Claims) [ECF No. **52980**] (the "Claims Objection") with the Court for hearing.

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Response Deadline”) for parties to object or file responses to the Claims Objection. The Response Deadline was set for July 5, 2016 at 4:00 p.m. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed. To the best of my knowledge, no responsive pleadings have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator with respect to the claim held by the parties listed on Exhibit A hereto. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Claims Objection, annexed hereto as Exhibit B, as to the claims held by the parties listed on Exhibit 1 to the proposed order, be entered in accordance with the procedures described in the Second Amended Case Management Order. No changes have been made that would affect the Satisfied Guaranty Claims.

I declare that the foregoing is true and correct.

Dated: July 5, 2016
New York, New York

/s/ Garrett A. Fail

Garrett A. Fail

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Exhibit A

Claim No.	Claimant
46947	Deutsche Bank AG, London (HK)
19415	E. Sun Commercial Bank, Ltd.
19414	E. Sun Commercial Bank, Ltd., Offshore Banking Branch
18898	JPMorgan Chase Bank, N.A.
18898	Loomis Street, LLC
12922	Taishin International Bank
18898	Varde Investment Partners LP

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	X	

**ORDER GRANTING THE PLAN ADMINISTRATOR’S FIVE HUNDRED EIGHTEENTH
OMNIBUS OBJECTION TO CLAIMS (SATISFIED GUARANTY CLAIMS)**

Upon the five hundred eighteenth omnibus objection to claims, dated June 6, 2016 (ECF No. 52980) (the “Objection”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases, pursuant to section 502(b) of the Bankruptcy Code, Rule 3007 of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (ECF No. 6664), seeking disallowance of certain claims that have been deemed satisfied in full in accordance with the Plan, all as more fully described in the Objection; and due and proper notice of the Objection having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

ORDERED that the relief requested in the Objection is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Five Hundred Eighteenth Omnibus Objection to Claims that is not listed on Exhibit 1; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2016
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 518: EXHIBIT 1 - SATISFIED GUARANTY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 DEUTSCHE BANK AG, LONDON (HK)	08-13555 (SCC)	Lehman Brothers Holdings Inc.	10/26/2009	46947	\$1,020,699.44	\$1,020,699.44	SATISFIED GUARANTY CLAIMS
2 E. SUN COMMERCIAL BANK, LTD.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/18/2009	19415	\$5,080,275.01	\$5,080,275.01	SATISFIED GUARANTY CLAIMS
3 E. SUN COMMERCIAL BANK, LTD., OFFSHORE BANKING BRANCH	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/18/2009	19414	\$10,140,283.33	\$10,140,283.33	SATISFIED GUARANTY CLAIMS
4 JPMORGAN CHASE BANK, N.A.	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/18/2009	18898	\$4,000,000.00 *	\$4,000,000.00 *	SATISFIED GUARANTY CLAIMS
5 LOOMIS STREET, LLC	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/18/2009	18898	\$25,432,277.79 *	\$25,432,277.79 *	SATISFIED GUARANTY CLAIMS
6 TAISHIN INTERNATIONAL BANK	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/15/2009	12922	\$3,047,489.47	\$3,047,489.47	SATISFIED GUARANTY CLAIMS
7 VARDE INVESTMENT PARTNERS LP	08-13555 (SCC)	Lehman Brothers Holdings Inc.	09/18/2009	18898	\$1,000,000.00 *	\$1,000,000.00 *	SATISFIED GUARANTY CLAIMS